

# **EXHIBIT C**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A BRAZOS LICENSING AND DEVELOPMENT,	§ CIVIL ACTION 6:20-CV-00473-ADA
Plaintiff,	§ CIVIL ACTION 6:20-CV-00474-ADA
v.	§ CIVIL ACTION 6:20-CV-00475-ADA
DELL TECHNOLOGIES INC., et al. . ,	§ CIVIL ACTION 6:20-CV-00476-ADA
Defendants.	§ CIVIL ACTION 6:20-CV-00477-ADA
	§ CIVIL ACTION 6:20-CV-00478-ADA
	§ CIVIL ACTION 6:20-CV-00479-ADA
	§ CIVIL ACTION 6:20-CV-00480-ADA
	§ CIVIL ACTION 6:20-CV-00481-ADA
	§ CIVIL ACTION 6:20-CV-00482-ADA
	§ CIVIL ACTION 6:20-CV-00485-ADA
	§ CIVIL ACTION 6:20-CV-00486-ADA
	§
	§ PATENT CASE
	§
	§
	§ JURY TRIAL DEMANDED

**PLAINTIFFS' PROPOSED LIST OF TERMS AND  
CLAIM ELEMENTS FOR CONSTRUCTION**

Plaintiff WSOU Investments, LLC d/b/a Brazos License and Development (“WSOU”) submits the following list of proposed terms and claim elements for construction pursuant to the Order Governing Proceedings (“OGP”) and the Scheduling Order entered in this case.

Plaintiff reserves the right to update, supplement, revise, or otherwise modify the proposed terms for construction in light of further investigation and discovery, including evidence not yet produced by Defendant, or in light of modification or supplementation of Defendant’s invalidity contentions. Plaintiff also reserves the right to select any terms or phrases proposed by Defendant and take the position that the ordinary meaning applies to one or more terms. Plaintiff reserves the right to argue that the plain and ordinary meaning should apply to any claim term identified herein.

-473

Terms for U.S. Patent No. 9,137,144	
None - no terms and claim elements are required for construction	

-474

Terms for U.S. Patent No. 7,212,536	
1.	“means for reading priorities of data frames directed by the bridge to at least a first one of the bridge ports”
2.	“means for determining a number of the sendee interfaces associated with active channels in the connection-based network”
3.	“means for establishing a mapping between user priorities read by the means for reading priorities of data frames and the service interfaces associated with active channels in the connection-based network based at least in part on a number of the service interfaces associated with active channels in the connection-based network”
4.	“means for assigning frames to the service interfaces based upon the user priorities and the mapping”

-475

Terms for U.S. Patent No. 7,453,888	
None - no terms and claim elements are required for construction	

-476

Terms for U.S. Patent No. 7,565,435	
None - no terms and claim elements are required for construction	

-477

Terms for U.S. Patent No. 8,913,489	
None - no terms and claim elements are required for construction	

-478

Terms for U.S. Patent No. 7,126,921	
1.	“computing means for controlling the node”
2.	“data plane means for forwarding packets between the nodes”
3.	“data plane means for forwarding packets to other nodes in the network”
4.	“the data, plane means”
5.	“means for fast propagation of node related information”

-479

Terms for U.S. Patent No. 8,402,129	
None - no terms and claim elements are required for construction	

-480

Terms for U.S. Patent No. 7,539,133	
1.	“means for determining an egress node associated with each of a plurality of packets of a traffic flow received at an ingress node adapted for splitting the traffic flow into a plurality of traffic flow portions independent of the egress node by which each packet is assigned to exit the load-balancing network”
2.	“means for determining, for each packet, whether a congestion condition exists on the egress node”

Terms for U.S. Patent No. 7,539,133

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| 3. | “means for processing the packets such that packets associated with egress nodes for which the congestion condition does not exist have a different queuing priority within the load-balancing network than packets associated with egress nodes for which the congestion condition exist” |
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-481

Terms for U.S. Patent No. 9,164,800

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| 1. | “maximize” |
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-482

Terms for U.S. Patent No. 7,424,020

None - no terms and claim elements are required for construction
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-485

Terms for U.S. Patent No 7,636,309

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| 1. | “node”         |
| 2. | “traffic flow” |
| 3. | “path”         |

-486

Terms for U.S. Patent No. 7,092,360

None - no terms and claim elements are required for construction
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Dated: January 6, 2021

Respectfully submitted,

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*Counsel for Plaintiff WSOU Investments, LLC*

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing instrument was served or delivered electronically via U.S. District Court [LIVE]- Document Filing System, to all counsel of record, on this the 6th day of January 2021.

/s/ Ryan S. Loveless  
Ryan S. Loveless